

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Tamarious Faulkner

Case: 2:22-mj-30102

Assigned To : Unassigned

Assign. Date : 2/25/2022

CMP: SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 1, 2019 - December 14, 2019 in the county of Jackson in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. §§ 371 & 922(j)

Offense Description

Conspiracy to receive and possess stolen firearms

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

*Complainant's signature*

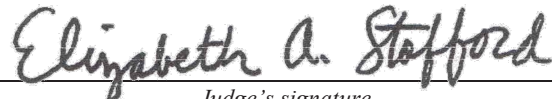
Matthew Rummel, Special Agent (ATF)

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

February 25, 2022

Date: _____

City and state: Detroit, Michigan*Judge's signature*

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

v.

TAMARIOUS FAULKNER,

Defendant.

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UNDER SEAL

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Matthew Rummel, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and have been so employed since September 2014. I am currently assigned to the Detroit Field Division. Prior to joining the ATF, I was employed, for approximately eight years, as a State Parole Agent with the Michigan Department of Corrections (MDOC). During that time, for approximately four years, I was assigned to a multi-jurisdictional task force made up of federal, state, and local law enforcement agencies. I have participated in numerous investigations involving firearms, narcotics trafficking by armed individuals, fraud, robberies, assaults, homicides, and criminal street gangs. I have

been the affiant on numerous federal search warrants and federal criminal complaints. I have a Bachelor's degree in criminal justice, and I am a graduate of the Federal Law Enforcement Training Center Criminal Investigator School and ATF's Special Agent Basic Training school.

2. This affidavit is based upon information I have gained from my investigation, my training and experience, and from information provided by law enforcement officers and others who have personal knowledge of the events and circumstances described herein. The information set forth in this affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not include all the information collected during this investigation and about which I am aware.

3. I submit this affidavit in support of a criminal complaint charging that, beginning on or about December 1, 2019, and continuing through on or about December 14, 2019, within the Eastern District of Michigan, the defendant, Tamarious FAULKNER (D.O.B. XX/XX/1996), knowingly and willfully combined, conspired, confederated, and agreed with Christopher RUSSELL¹ and with other persons to commit an offense against the United States—that is, to

¹ A federal grand jury returned a sealed indictment against Christopher RUSSELL in Case No. 4:21-cr-20292. The government will move to unseal that indictment at the time the instant complaint is unsealed, after defendant Tamarious FAULKNER is arrested.

receive and possess stolen firearms, which had been shipped and transported in interstate commerce, knowing and having reasonable cause to believe the firearms were stolen, in violation of Title 18, United States Code, Section 922(j)—all in violation of Title 18, United States Code, Section 371.

PROBABLE CAUSE

4. In December 2019, four Federal Firearms Licensees (FFLs), i.e., gun stores, in southern Michigan were broken into and burglarized. In total, at least sixty-four (64) firearms were stolen in these burglaries.

5. All of the firearms stolen from the FFLs in these burglaries were manufactured outside the state of Michigan, and therefore these firearms traveled in interstate commerce from their point(s) of manufacture to Michigan.

6. In connection with the investigation of these FFL burglaries, the ATF received information from a confidential source (hereinafter “the CS”) regarding certain FFL burglaries and subsequent sales of stolen firearms. The CS has been charged with federal criminal charges and began cooperating with law enforcement to seek consideration for his/her truthful information and potential testimony. The information provided by the CS that is used in this affidavit has been investigated and found to be reliable and credible.

7. On or about December 1, 2019, Patriots Ammo and Arms, a federally licensed firearms dealer located at 52122 Van Dyke Avenue, Shelby Township,

Michigan, was burglarized and approximately fourteen (14) firearms were stolen. Four individuals—who are known to law enforcement and who are identified herein as Co-conspirator 1 (“C-1”), Co-conspirator 2 (“C-2”), Co-conspirator 3 (“C-3”), and Co-conspirator 4 (“C-4”)—committed this burglary and theft, according to the CS. After the burglary, C-1, C-2, C-3, and C-4 drove from Shelby Township, Michigan, to Jackson, Michigan. Subsequently, C-1, C-2, and C-3 met with FAULKNER and RUSSELL at a residence on Oakhill Avenue in Jackson, Michigan, at which time C-1, C-2, and C-3 sold stolen firearms to FAULKNER and RUSSELL.

8. Approximately one week later, on or about December 8, 2019, Ralph’s Gun Shop Inc., a federally licensed firearms dealer located at 12542 Leeke Road, Stockbridge, Michigan, was burglarized and approximately seven (7) firearms were stolen. C-1, C-2, and C-3 committed this burglary and theft, according to the CS. After the burglary, C-1, C-2, and C-3 sold stolen firearms to FAULKNER and RUSSELL at a location in Jackson, Michigan.

9. On or about December 11, 2019, Titus Kustoms LLC, a federally licensed firearms dealer located at 731 S. Grand Avenue, Fowlerville, Michigan, was burglarized and approximately seventeen (17) firearms were stolen. C-1, C-2, and C-3 committed this burglary and theft, according to the CS. After the

burglary, C-1, C-2, and C-3 sold stolen firearms to FAULKNER and RUSSELL at a location in Jackson, Michigan.

10. On or about December 14, 2019, Semper Fi Guns and Ammo LLC, a federally licensed firearms dealer located at 148 Mason Street, Addison, Michigan, was burglarized and approximately twenty-six (26) firearms were stolen. C-1 and C-3 committed this burglary, according to the CS. After the burglary, C-1 and C-3 sold stolen firearms to FAULKNER and RUSSELL at a location in Jackson, Michigan. Security camera video footage from a residence located near this location reflected that two individuals matching the descriptions of FAULKNER and RUSSELL arrived at the location in a black Jeep Grand Cherokee and then departed a short time later. At points in time both before and after December 14, 2019, law enforcement observed FAULKNER driving a black Jeep Grand Cherokee.

11. Approximately one year later, on or about December 9, 2020, the ATF executed a federal search warrant at a residence in Jackson, Michigan, that was associated with RUSSELL. In a bedroom identified as RUSSELL's, agents recovered a Glock, Model 17, 9mm caliber semi-automatic handgun, which was identified as stolen from Titus Kustoms LLC during the burglary that occurred on December 11, 2019. When agents recovered the firearm, it had a "switch" conversion kit affixed to it.

12. A “switch” is an after-market conversion kit which makes a semi-automatic handgun function as a fully automatic firearm, i.e., as a machinegun. Glock switches are considered machineguns and regulated under the National Firearms Act (NFA).

CONCLUSION

13. Based on the foregoing, I respectfully submit there is probable cause that, beginning on or about December 1, 2019, and continuing through on or about December 14, 2019, within the Eastern District of Michigan, the defendant, Tamarious FAULKNER (D.O.B. XX/XX/1996), knowingly and willfully combined, conspired, confederated, and agreed with Christopher RUSSELL and with other persons to commit an offense against the United States—that is, to receive and possess stolen firearms, which had been shipped and transported in

interstate commerce, knowing and having reasonable cause to believe the firearms were stolen, in violation of Title 18, United States Code, Section 922(j)—all in violation of Title 18, United States Code, Section 371.

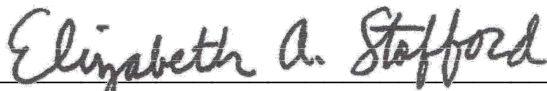
Respectfully submitted,



By:

Matthew Rummel
Special Agent
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in
my presence and/or by reliable electronic means.



HON. ELIZABETH A. STAFFORD
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF MICHIGAN

Date: February 25, 2022